

choosing an error proofing technique to fit a given application, or storing an error proofing technique within a database.

Applicants respectfully submit that the Section 103 rejection of the presently pending claims is not a proper rejection. As is well established, the mere assertion that it would have been obvious to one of ordinary skill in the art to have modified Mandyam to obtain the claimed recitations of the present invention does not support a *prima facia* obvious rejection. Rather, each allegation of what would have been an obvious matter of design choice must always be supported by citation to some reference work recognized as standard in the pertinent art and the Applicants given the opportunity to challenge the correctness of the assertion or the notoriety or repute of the cited reference.

Furthermore, in contrast to the assertion within the Office Action, Applicants respectfully submit that it would not be obvious to one skilled in the art to have modify Mandyam because the Examiner has not pointed to any prior art that teaches or suggests to modify Mandyam to obtain the claimed invention, other than Applicants' own teaching. Only the conclusory statement that "it would have been obvious [to] a person having ordinary skill in the art to include at least one of the tables comprising at least one error proofing example and meta data defined by a user when creating an error proofing example into the system of Mandyam to provide an error proofing example information to a client user" suggests modifying Mandyam. Applicants respectfully submit however, that the prior art teaches away from the present invention. More specifically, none of the prior art cited describe or suggest an apparatus or a method for choosing an error proofing technique to fit a given application, or storing an error proofing technique within a database.

Notwithstanding the propriety of the rejection, Applicants nonetheless submit that Claims 1-20 are patentable over Mandyam. Specifically, Claim 1 recites a system comprising "a plurality of clients...a server comprising a plurality of servlets, at least some of said servlets providing at least one of a database and server access capability to each said client...said database comprising a plurality of tables, at least one of said tables comprising at least one error proofing example and meta-data defined by a user when creating an error proofing example...." Specifically, Mandyam does not describe nor suggest a table including at least one error proofing example, and meta-data defined by a user when creating an error proofing example. Rather, in contrast to the present invention, Mandyam describes a

database that includes a plurality of HTML help files that provide a set of instructions and fundamental guidance for users of software applications. Accordingly, for at least the reasons set forth above, Claim 1 is submitted to be patentable over Mandyam.

Claims 2-12 depend, directly or indirectly, from independent Claim 1. When the recitations of Claims 2-12 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 2-12 likewise are patentable over Mandyam.

Claim 13 recites a method for identifying an error proofing technique for a given application using a web-based system, wherein the system includes a plurality of clients including a plurality of user interface classes, and a database including a plurality of tables including at least one example of an error proofing technique and user defined meta-data, and wherein the method comprises the step of “choosing an error proofing technique to fit the given application.” Specifically, Mandyam does not describe nor suggest using a web-based system that includes a database including at least one example of an error proofing technique, or a method for identifying an error proofing technique for a given application including the step of choosing an error proofing technique to fit a given application. Rather, in contrast to the present invention, Mandyam describes a database that includes a plurality of HTML help files that provide a set of instructions and fundamental guidance for users of software applications. Accordingly, for at least the reasons set forth above, Claim 13 is submitted to be patentable over Mandyam.

Claims 14-20 depend, directly or indirectly, from independent Claim 13. When the recitations of Claims 14-20 are considered in combination with the recitations of Claim 13, Applicants submit that dependent Claims 14-20 likewise are patentable over Mandyam.

For the reasons set forth above, Applicants respectfully request that the Section 103 rejection of Claims 1-20 be withdrawn.

In view of the foregoing amendments and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully Submitted,

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